UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

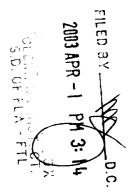
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Case No. 00-6306-CR-ZLOCH

UNITED STATES OF AMERIC	A
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GOVERNMENT'S RESPONSE TO DEFENDANT'S MOTION FOR EARLY TERMINATION OF PROBATION

The United States of America, by and through undersigned counsel, hereby responds to Defendant's Motion for Early Termination of Probation and states as follows:

- 1. The United States opposes Defendant's Motion for Early Termination of Probation. Defendant pled guilty to the serious crime of counterfeiting and could have been sentenced to jail time. Instead, he was fortunate to receive a sentence of probation with no jail time and no community service, fine, or other non-standard conditions. While the United States is pleased that the defendant has successfully completed twenty-six of the thirty-six months to which he was sentenced, the United States respectfully submits that defendant should complete the entire sentence.
- 2. Defense counsel has advised undersigned counsel that defendant is pursuing employment in the area of engineering. The United States does not object to defendant's pursuit of career opportunities outside the United States. To the extent that defendant's career opportunities take him outside the United States, the United States would have no objection to making defendant's remaining portion of his probation a non-reporting period for as long as defendant is outside the United States, so long as defendant presents himself to the probation office within 72 hours of any



and all returns to the United States during the remainder of the probation period.

Respectfully submitted,

MARCOS DANIEL JIMENEZ UNITED STATES ATTORNEY

By:

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this notice was sent this set day of April, 2003, by United States Mail, to Michael E. Jones, Esq., 440 South Andrews Avenue, Fort Lauderdale, Florida 33301.

Robin S. Rosenbaum

Assistant U.S. Attorney